

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF OREGON

In Re:)	
JENNIFER R. RAMOS)	Case No: 18-33749-pcm7
)	
Debtor(s).)	
_____)	Adversary Proc. No:
KENNETH S. EILER, TRUSTEE)	COMPLAINT TO REVOKE
)	DISCHARGE
Plaintiff,)	
vs.)	
JENNIFER R. RAMOS)	
)	
Defendant(s).)	
_____)	

Plaintiff alleges

1.

This is a core proceeding brought pursuant 28 USC 157 and 11 USC 727 by the Chapter 7 trustee seeking to revoke the bankruptcy discharge previously granted to the Defendant(s), (hereinafter referred to as Defendant or Debtor).

2.

Plaintiff is the duly appointed and acting Chapter 7 Trustee. The Defendant is the Chapter 7 Debtor.

3.

The Defendant filed a Chapter 7 bankruptcy petition on October 29, 2018. On February 26, 2019, this court entered an order requiring the Debtor to turn over to the Trustee the following described property, to wit: all rents received since 10-29-18 from the real property located at 19560 Hollygrape St. Bend, OR 97702 together with all rents hereinafter paid; plus the full names of the tenants renting the Hollygrape property together with a complete copy of

the rent agreement therefore. Despite this directive from the court, the debtor failed and refused to turnover rents collected since her bankruptcy filing. More significantly, the debtor continued to collect rents after entry of this court's turnover order until recently when the Trustee was able to contact the tenants and alert them that all future rents were to be sent to the bankruptcy estate. In total, the Debtor has failed to turnover to the Trustee the sum of \$19,170.00 in rents received since her bankruptcy filing.

4.

Defendant/Debtor wilfully failed to comply with an order of this court in violation of 11 USC 727(a)(6)(A) and (d)(3). The bankruptcy discharge previously granted the Defendant should be revoked and the Trustee should be awarded a judgment in the sum of \$19,170.00.

5.

The Plaintiff consents to entry of a judgment in this matter by the Bankruptcy Court.

WHEREFORE Plaintiff prays for an Order revoking Defendant's discharge in bankruptcy and awarding him a judgment for \$19,170.00 plus costs and disbursements incurred herein.

/s/ Kenneth S. Eiler
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